

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BHARTI R. BHARWANI and ROBERT A.
ZIRINSKY, individually on behalf of all
others similarly situated,

Plaintiffs,

v.

LINCOLN NATIONAL CORP., and
LINCOLN NATIONAL LIFE INSURANCE
COMPANY,

Defendants.

Case No.: 2:16-cv-06605-GJP

**MOTION FOR *PRO HAC VICE* ADMISSION
OF ATTORNEY MICHAEL L. HIRSCHFELD**

Pursuant to Local Rule 83.5.2(b) and this Court's Policy and Procedures I.D, Defendants Lincoln National Corp. and The Lincoln National Life Insurance Company hereby move for the *pro hac vice* admission of Michael L. Hirschfeld, Esquire, as counsel in this case. The undersigned is admitted to practice and in good standing before this Court. The undersigned's appearance has been entered in this case. This motion is required because Defendants have retained Mr. Hirschfeld's law firm, Milbank, Tweed, Hadley & McCloy LLP, to provide legal services in connection with the above-captioned matter. Counsel for Defendants has conferred with Counsel for Plaintiffs on the matter set forth in this motion and Plaintiffs do not object to this motion. Attached to this motion is Mr. Hirschfeld's affidavit. In addition, a check in the amount of \$40.00 is being submitted with this motion. The undersigned member of the bar of the United States District Court for the Eastern District of Pennsylvania certifies that I know (or after reasonable inquiry believe) that the applicant is a member in good standing of the bars of the

state and federal courts referenced in the affidavit of Mr. Hirschfeld and that the applicant's private and personal character is good.

Date: March 8, 2017

Respectfully Submitted,

/s/ Robert C. Folland
Robert C. Folland (PA No. 320318)
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Rob.Folland@btlaw.com
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2017, a true and accurate copy of the foregoing document was served upon all parties of record through the Court's ECF filing system.

/s/ Robert C. Folland
Robert C. Folland

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ORDER

AND NOW, this _____ Day of _____, 2017, it is hereby ORDERED and DECREED that the application for admission *pro hac vice* of Michael L. Hirschfeld, Esquire is granted and that Michael L. Hirschfeld, Esquire is admitted *pro hac vice* without restriction, for the purpose of appearing and representing Defendants Lincoln National Corp. and The Lincoln National Life Insurance Company, in this litigation.

Date:

Judge Gerald J. Pappert